

HPSNZ PRIVACY POLICY GUIDANCE: CONSIDERATIONS AND RECOMMENDATIONS



The purpose of this document is to provide considerations and recommendations that support NSOs when creating Privacy Policies in high performance environments (HPEs).

General considerations	HPE-relevant considerations
Meet the requirements of the NZ Privacy Act 2020 and the Privacy Principles and sets expectations for your people to enable compliance with these	Unique factors of the sport (e.g., athlete median age, gender, weight classification requirements, designated platforms and communication channels used to collect, store and share athlete information)
Ensure at least one individual is designated as the Privacy Officer as required by the Privacy Act 2020, and their role is clearly articulated and supported by leadership	Sensitive information (e.g., health information, financial information) which requires heightened protections and restrictions
Clarify the purpose of the Privacy Policy document	Athlete performance support needs/requirements
Articulate your mission, values and principles based on your strategic plan and require any collection of personal information to align to this	Security of data collection methods (e.g., surveys, check-ins and their locations, technology – including wearables, testing/assessments) and access permissions
Your Privacy policy should apply to the management of “personal information” (i.e., information about an identifiable individual, which can include employee information, athlete identity and contact information, training and performance information, health information and also information about your members)	Transparent privacy statements for athletes and other groups of individuals you collect information about (e.g., this Statement for athletes receiving performance support from HPSNZ)
Specify who the policy applies to and clarify what their roles and responsibilities are (e.g., employees, managers, leadership, Board, Privacy Officer)	Provision of training and education to ensure clarity and understanding across stakeholders
Include a flowchart that clearly outlines processes used to address issues (e.g., privacy breaches and requests for access to information) in a way that complies with the Privacy Act	Alignment to HPSNZ Wellbeing Framework and Guidelines and related materials
Emphasise what best practice looks like (examples can be helpful)	
Have a process to delete or anonymise/deidentify athlete information when it is no longer needed for the original purpose it was collected for	

RECOMMENDATIONS:

1. Once clarity is achieved, establish the various factors that are distinct and/or will require particular consideration based on your HPE.
2. Engage in legal consultation and ensure that you attend to General and your HPE-specific considerations in your Privacy Policy (and all policy documents).
3. Include relevant parties throughout the development and implementation process (anyone who should have input and awareness).
4. You may want to refer to related policies as part of or in connection to your Privacy Policy (e.g., [Wellbeing Programme Resources Hub – HPSNZ](#)).
5. Ensure that you disseminate your Privacy Policy (and any Privacy statements/notices documents as appropriate) to ALL relevant parties at onboarding and on a regular basis, and carry out regular reviews of these documents to ensure they remain up-to-date.

ADDITIONAL RESOURCES

Sport NZ Group Legislative Compliance Manual: [legislative-compliance-manual-2024.pdf](#).

This includes an overview of the legal/compliance requirements for sport and recreation organisations in NZ including privacy requirements.

NZ Privacy Commissioner website: <https://www.privacy.org.nz/>, in particular:

- How to do privacy well: <https://www.privacy.org.nz/responsibilities/poupou-matatapu-doing-privacy-well/>
- Privacy Statement Generator: <https://www.privacy.org.nz/tools/privacy-statement-generator/>
- E-learning modules: <https://elearning.privacy.org.nz/>